

# EXHIBIT A

SUMMONS IN CIVIL ACTION - CHANCERY COURT

STATE OF TENNESSEE  
CHANCERY COURT OF MARION COUNTY  
AT JASPER

IN RE: ESTATE OF OMA E. GRIFFITH )

Deceased )

DEBORAH HOOPER )

Plaintiff )

v. )

UNDERWRITERS AT LLOYD'S )  
750 7<sup>th</sup> Avenue, New York, New York )  
10019 and ATLANTIC SPECIALITY )  
LINES OF VIRGINIA, LLC, 9020 )  
Stony Point Parkway, Suite 450 )  
Richmond, VA 23235 )

Defendants )

No.:

7747

SUMMONS

To the above named Defendant:

**Underwriters at Lloyds**  
750 7<sup>th</sup> Avenue  
New York, New York 10019

**Atlantic Speciality Lines of Virginia, LLC**  
9020 Stony Point Parkway, Suite 450  
Richmond, VA 23235

**Ms. Julie Mix McPeak, Commissioner**  
**Department of Commerce & Insurance**  
**500 James Robertson Parkway**  
**Nashville, TN 37243-0565**

You are hereby summoned and required to serve upon J. Harvey Cameron, Plaintiff's attorney, whose address is P.O. Box 759, Jasper, Tennessee 37347, an answer to the Complaint which is herewith served upon you within thirty (30) days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

Issued this 13<sup>th</sup> day of June, 2014, at 8:00 o'clock P.M.

WITNESS, LEVOY GUDGER, Circuit Court Clerk of said Court, at office this the 13<sup>th</sup> day of June, 2014.

Levoy Gudger  
LEVOY GUDGER, Clerk and Master

Plaintiff's address: c/o J. Harvey Cameron, P.C., Post Office Box 759, Jasper, TN 37347.

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LEVOY GUDGER, Clerk and Master

Plaintiff's address: c/o J. Harvey Cameron, P.C., Post Office Box 759, Jasper, TN 37347.



RECEIVED FILED  
8:00 HRS.

IN THE TWELFTH JUDICIAL DISTRICT OF TENNESSEE  
CHANCERY COURT OF MARION COUNTY

JUN 13 2014

LEVOY GUDGER  
CLERK & MASTER

IN RE: ESTATE OF OMA E. GRIFFITH )

Deceased )

DEBORAH HOOPER )

Plaintiff )

v. )

No.: 7747

UNDERWRITERS AT LLOYD'S )

750 7<sup>th</sup> Avenue, New York, New York )

10019 and ATLANTIC SPECIALITY )

LINES OF VIRGINIA, LLC, 9020 )

Stony Point Parkway, Suite 450 )

Richmond, VA 23235 )

Defendants )

COMPLAINT

Comes the Plaintiff, **DEBORAH HOOPER**, as Administrator of the Estate of Oma E. Griffith, the Co-Administrator, Elbert Griffith, now being deceased, and individually sues the Defendants, Underwriters at Lloyd's and Atlantic Speciality Lines of Virginia, LLC, and for her cause of action would show unto the Court as follows:

I

The Defendants caused to be issued on behalf of the Oma Griffith Estate an insurance policy covering the property of the Deceased located at 7321 Highway 108, Whitwell, Marion County, Tennessee. A copy of the Declaration Page is attached as Exhibit "1" to this Complaint and incorporated herein.

II

On June 14, 2013, pursuant to Order of the Chancery Court of Marion County,



Tennessee the above subject property was sold at public auction and Gary Hooper purchased same. An Order confirming the report of the Clerk and Master was entered on July 16, 2013.

### III

On the 14<sup>th</sup> of July, 2013, or on the morning of July 15, 2013, the home located on the premises purchased by Gary Hooper and insured by the Defendants was totally destroyed. Gary Hooper, the successful bidder, at the sale requested that said property be vested in his wife, Deborah D. Hooper, a copy of which Clerk and Master's Deed is attached hereto as Exhibit "2" to this Complaint.

### IV

Claims were duly filed through Russ Hood Agency, the agent who caused said policy to be issued. To date, the Plaintiff has had no contact with any claim's agent of the Defendants nor any compensation for the loss although the amount of insurance was One Hundred Twenty Thousand Dollars (\$120,000.00) for said loss. Deborah D. Hooper individually joins in this action due to the fact that said property and improvements thereon had been sold to her husband and ultimately vested in her and although the insurance was still in the name of Oma Griffith's Estate it had not been changed as of date of loss. The Plaintiff avers that she is entitled to the benefits of coverage under the policy unless the Court determines that said proceeds should be payable to the Estate of Oma Griffith.

### V

The Plaintiff in her respective capacities sues the Defendants and each of them in the amount of One Hundred Twenty Thousand Dollars (\$120,000.00) and pre-judgment interest.

SURETY FOR COSTS

CAMERON & CAMERON, P.C.

By: J. Harvey Cameron

Respectfully submitted,

CAMERON & CAMERON, P.C.  
28 Courthouse Square, Suite 100  
Post Office Box 759  
Jasper, TN 37347  
(423) 942-9975  
E-mail: jhcam@aol.com

By: J. Harvey Cameron  
J. Harvey Cameron, BPR#2465  
Attorney for the Administrator

STATE OF TENNESSEE  
COUNTY OF MARION

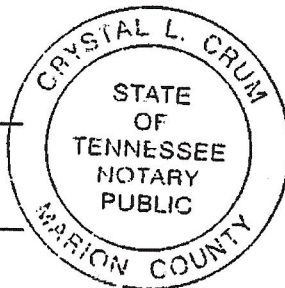
I, DEBORAH HOOPER, individually and as Administrator, being duly sworn according to law, make oath that the statements made in the foregoing Complaint are true in substance and fact, to the best of my knowledge, information and belief.

Deborah Hooper  
DEBORAH HOOPER, Individually and  
Administrator

Sworn to and subscribed before  
me 12 day of June, 2014.

Crystal L. Crum  
Notary Public

My commission expires: 11.6.11



Previous Policy Number AS201VA49743-0

Current Policy Number AS201VA49743-1

Proposed Effective Date 03/15/2013 Proposed Expiration Date 03/15/2014  
both days at 12:01 a.m. standard time

Program: Dwelling Fire

## Name and address of the Insured

Oma Griffith Estate C/o Deb Hooper & Elbert Griffith  
6565 Francis Springs Rd

## Name and address of Agent

Russ Hood Agency  
4139 Main Street  
Jasper, TN 37347

Whitwell, TN 37397.

Carrier	Authority Reference #	UMR #	Percentage
Underwriters at Lloyd's	AS201/13	B040312ARB117	100 %

Premises Location 7321 Hwy 108 Whitwell, TN 37397

Coverages and Limits of Liability Coverage is provided where a premium or limit of liability is shown for the coverage. In case of a loss under Section I, we cover only that part of the loss over the deductible stated.

## Section I Property

A) Dwelling	\$ 120,000
B) Other Structures	\$ 12,000
C) Personal Property	\$ (Excl)
D) Loss of Use	\$ 12,000

## Section II Liability

E) Personal Liability	\$ 300,000
F) Medical Payments to Others	\$ 1,000

## Optional Coverages

## Deductibles

S 1,000 AP

## Conditions and Underwriting Notes

**\*\*Flood is Excluded\*\***  
(unless otherwise stated in this policy.)

**\*\*Quake is Excluded\*\***

Premium, Taxes & Fees	Premium	Taxes	Fees
Section I - Property	\$ 1,267.00	Surplus Lines Tax \$ 70.85	Policy Fee \$ 100.00
Section II - Liability	\$ 50.00		
Optional Coverages	\$ 0.00		
<b>Subtotals</b>	<b>\$ 1,317.00</b>	<b>\$ 70.85</b>	<b>\$ 100.00</b>
<b>Grand Total</b>			<b>\$ 1,487.85</b>

## Other Interests

## Forms and Endorsements

HO 0190 (01/00)	RDNGS (01/08)	NMA 2920 (01/08)	NMA 1256 (01/08)	HO 0190 (01/00)
HO 0191 (01/00)	CMOZ (01/09)	NMA 2340 (01/08)	NMA 5021 (01/08)	ASL 1021 (01/08)
ASL FLD EX (01/08)	EMF (01/08)	NMA 5019 (01/08)	LSW 1301 (01/08)	ASL 1025 (03/08)
HO DEC (01/00)	LDPSN (01/08)	MOLD (01/08)	NMA 1168 (01/08)	ASL 1035 (01/11)
ASL CLAIM (01/09)	NMA 2802 (01/08)	LSW 1135b (01/08)	NMA 1331 (01/08)	ASL 1022 (01/08)
ALE (01/08)	NMA 2915 (01/08)	NMA 1191 (01/08)	ASL 1002 (11/99)	ASL 1028 (01/09)
UNSWFL (01/08)	NMA 464 (01/08)	NMA 5020 (01/08)	HO 0003 (01/00)	ASL 1027 (01/09)
				NMA 2962 (01/08)

\*\*\*PLEASE NOTE: ONCE THE RENEWAL PREMIUM HAS BEEN RECEIVED AT THE POLICY EXPIRATION DATE, THE COVERAGE IS CONSIDERED EXPIRED AND FLAT CANCELLATIONS ARE NOT PERMITTED. RENEWAL POLICIES ARE SUBJECT TO THE MINIMUM EARNED PREMIUM CLAUSE STATED IN THE POLICY AND ALL POLICY AMENDMENTS MUST BE FULLY EARNED. IF THE POLICY IS CANCELLED FOR ANY REASON, THE POLICY WILL BE CANCELLED FLAT WITH NO REFUND. \*\*\*



Prepared by and return to:  
J. HARVEY CAMERON, P.C.  
28 Courthouse Square, Suite 100  
Jasper, TN 37347; from information  
supplied by the parties.

SEND TAX BILLS TO:	MAP/PARCEL NUMBER
Deborah D Hooper	Map 11
6565 Francis Spring Road	Group
Whitwell, TN 37397	Portion of Parcel 093.00

**CLERK & MASTER'S DEED**

WHEREAS, the Clerk & Master of Marion County, Tennessee pursuant to judgment entered in Cause #PR-72, in the Chancery Court of Marion County, Tennessee, styled In Re: Estate of Oma E. Griffith, conducted a land sale on June 14, 2013. ; and,

WHEREAS, the Grantee herein was the highest and best bidder for the consideration herein stated; and,

WHEREAS, said sale was confirmed by order of the Marion County Chancery Court filed July 16, 2013, and entered in Minute Book 30, Pages 401, et seq., said Clerk & Master's Office; and,

WHEREAS, the purchaser at said sale being the grantee has requested the Clerk & Master to execute and deliver to him a deed for said property

NOW, THEREFORE, IN CONSIDERATION of the sum of Five Thousand Dollars (\$5,000 00) cash in hand paid, the receipt of which is hereby acknowledged, I, LEVOY GUDGER, Clerk & Master of the Chancery Court of Marion County, Tennessee, by virtue of the power and authority conferred upon me, do hereby transfer and convey unto

**DEBORAH D. HOOPER,**

her heirs and assigns, the following described real estate located in the Third Civil District of Marion County, Tennessee to-wit:

**TRACT ONE:**

Beginning at an iron pin in the west right-of-way line of State Highway 108 the Southeast corner of lands of J. C. Ritchie as described in deed of record in Deed Book 7-L, Pages 380, et seq., in the Register's Office of Marion County, Tennessee; thence along the west right-of-way of State Highway 108 South 54 deg. 50 min. 00 sec. East 188.57 feet to an iron pin; thence South 48 deg 12 min. 41 sec. West 115.06 feet to a power pole located in

-1-

the East right-of-way of Griffith Church Road; thence along the East right-of-way of Griffith Church Road North 35 deg. 56 min. 05 sec. West 154.45 feet to a point; thence along a curve to the right having an bearing of North 19 deg 55 min 41 sec. West 55.73 feet, an arc of 56.46 feet and radius of 101.05 feet to an iron pin the same being the Southwest corner of lands of J. C. Ritchie; thence along Ritchie's South line North 79 deg. 15 min. 00 sec. East 42.01 feet more or less to the Point of Beginning containing 0.32 acres more or less.

**TRACT TWO:**

Beginning at an iron pin in the East right-of-way of Griffith Church Road the same being the Northwest corner of lands of Clayton L. Worley of record in Deed Book 6-P, Pages 297, et seq., in the Register's Office of Marion County, Tennessee; thence along the east right-of-way line of Griffith Church Road North 35 deg. 56 min. 05 sec. West 55.52 feet to a power pole the same being the Southwest corner of Tract Number Two hereinabove described; thence along the South boundary line of Tract Number Two North 48 deg. 12 min. 41 sec. East 115.06 feet to an iron pin the same being in the West right-of-way line of State Highway 108; thence along the West right-of-way line of State Highway 108, South 54 deg. 50 min. 00 sec. East 93.65 feet to an iron pin the same being the Northeast corner of lands of Clayton L. Worley; thence along Worley's North boundary line South 40 deg. 21 min. 13 sec. West 152.00 feet more or less to the Point of Beginning containing 0.31 acres more or less.

**PRIOR DEED REFERENCE:** Deed Book 6-P, Pages 296, et seq., in the Register's Office of Marion County, Tennessee.

TO HAVE AND TO HOLD said real estate with all the hereditaments and appurtenances thereto, to the said Grantee, her heirs and assigns, in fee simple, forever  
This conveyance is made in as full and ample a manner as the said Clerk & Master can convey under authority of law and said judgment, entered in this cause, but not further or otherwise.

IN WITNESS WHEREOF, I have hereunto subscribed my name as said Clerk & Master, on this the 18<sup>th</sup> day of July, 2013.

  
LEVOY GUDGER, Clerk & Master

STATE OF TENNESSEE  
COUNTY OF MARION

On this the 18<sup>th</sup> day of July, 2013, before me personally appeared Levoy Gudger, Clerk & Master, to me known to be or proved to me on the basis of satisfactory evidence to be the persons described in and who executed the foregoing instrument and who acknowledged that he executed the same as his free act and deed.

Wick B. Layne  
Notary Public



My commission expires: 7-10-16

CONSIDERATION AFFIDAVIT

I, or we, hereby swear or affirm that the actual consideration for this transfer, or value of the property or interest in property transferred, whichever is greater is \$5,000.00, which amount is equal to or greater than the amount which the property or interest in property transferred would command at a fair and voluntary sale.

Levoy Gudger  
AFFIANT

Subscribed and sworn to before me this 24<sup>th</sup> day of July, 2013.

Michael L. Thompson  
NOTARY PUBLIC, or REGISTER

My Commission expires: 11/18/2013

BK/PG: 451/920-922

13002783

3 PGS. AL - CLERK & MASTERS DEED	
SANCHA BATCH 48183	07/24/2013 11:01:52 AM
VALUE	5000.00
MORTGAGE TAX	0.00
TRANSFER TAX	18.50
RECORDING FEE	15.00
ARCHIVE FEE	0.00
DP FEE	2.00
REGISTER'S FEE	1.00
TOTAL AMOUNT	36.50

STATE OF TENNESSEE, MARION COUNTY  
WINFRED HAGGARD  
REGISTER/M DEED



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CHANCERY COURT OF MARION COUNTY  
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Deceased )

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No.: 7747

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To the above named Defendant:

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9020 Stony Point Parkway, Suite 450  
Richmond, VA 23235Ms. Julie Mix McPeak, Commissioner  
Department of Commerce & Insurance  
500 James Robertson Parkway  
Nashville, TN 37243-0565

You are hereby summoned and required to serve upon J. Harvey Cameron, Plaintiff's attorney, whose address is P.O. Box 759, Jasper, Tennessee 37347, an answer to the Complaint which is herewith served upon you within thirty (30) days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

Issued this 13<sup>th</sup> day of June, 2014, at 8:00 o'clock P.M.

WITNESS, LEVOY GUDGER, Circuit Court Clerk of said Court, at office this the 13<sup>th</sup> day of June, 2014.

Levoy Gudger VL  
LEVOY GUDGER, Clerk and Master

Plaintiff's address: c/o J. Harvey Cameron, P.C., Post Office Box 759, Jasper, TN 37347.

Received this \_\_\_\_\_ day of \_\_\_\_\_,

(This summons is issued pursuant to Rule 4 of the Tennessee Rules of Civil Procedure).

\_\_\_\_\_  
Sheriff-Deputy Sheriff

## SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Certified Return Receipt Requested  
Underwriters at Lloyds  
750 7<sup>th</sup> Avenue  
New York, NY 10019

## COMPLETE THIS SECTION ON DELIVERY

A. Signature

x Keith Case ☐ Agent ☐ Addressee

B. Received by (Printed Name)

Case

C. Date of Delivery

6/24/14

D. Is delivery address different from item 1? ☐ YesIf YES, enter delivery address below: ☐ No

\_\_\_\_\_, 2014,  
this summons together

ance because \_\_\_\_\_

\_\_\_\_\_  
Sheriff\_\_\_\_\_  
Deputy Sheriff

3. Service Type

- ☒ Certified Mail ☐ Express Mail  
☐ Registered ☒ Return Receipt for Merchandise  
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes2. Article  
(Transit)

7011 2970 0003 4861 0021

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

Tennessee law provides a four thousand dollar (\$4,000) personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the clerk of this court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued in the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary wearing apparel (clothing) for yourself and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible, and school books. Should any of these items be seized you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer. (T.C.A., 26-2-114).



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Levoy Gudger VL  
LEVOY GUDGER, Clerk and Master

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Received this \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_

(This summons is issued pursuant to Rule 4 of the Tennessee Rules of Civil Procedure).

**Sheriff-Deputy Sheriff**

<b>SENDER: COMPLETE THIS SECTION</b>	<b>COMPLETE THIS SECTION ON DELIVERY</b>
<p> <input checked="" type="checkbox"/> Complete Items 1, 2, and 3. Also complete Item 4 if Restricted Delivery is desired.  <input checked="" type="checkbox"/> Print your name and address on the reverse so that we can return the card to you.  <input checked="" type="checkbox"/> Attach this card to the back of the mailpiece, open the front if space permits.         </p> <hr/> <p> <b>1. Article Addressed to:</b>             Certified Return Receipt Requested            Atlantic Speciality Lines of Virginia LLC            9020 Stony Point Parkway, Suite 450            Richmond, VA 23235         </p>	<p> <b>A. Signature</b>  <i>Eileen F. Turner</i> <input type="checkbox"/> Agent  <input checked="" type="checkbox"/> Addressee         </p> <p> <b>B. Received by (Printed Name)</b>  <i>Eileen F. Turner</i> </p> <p> <b>C. Date of Delivery</b>  <i>4/11/94</i> </p> <p> <b>D. Is delivery address different from item 1?</b> <input type="checkbox"/> Yes            If YES, enter delivery address below: <input type="checkbox"/> No         </p>
<p> <b>2. Article</b>  <i>(Transit)</i> </p>	<p> <b>3. Service Type</b>  <input checked="" type="checkbox"/> Certified Mail    <input type="checkbox"/> Express Mail  <input type="checkbox"/> Registered    <input checked="" type="checkbox"/> Return Receipt for Merchandise  <input type="checkbox"/> Insured Mail    <input type="checkbox"/> C.O.D.         </p>
<b>4. Restricted Delivery? (Extra Fee)</b> <input type="checkbox"/> Yes	
<div style="border: 1px solid black; padding: 10px; display: inline-block;"> <b>7011 2970 0003 4861 0038</b> </div>	

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1640

\_\_\_\_\_, 2014,  
and this summons together

ance because \_\_\_\_\_

**Sheriff**

**Deputy Sheriff**

TO THE DEFENDANT(S):

Tennessee law provides a four thousand dollar (\$4,000) personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the clerk of this court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued in the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary wearing apparel (clothing) for yourself and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible, and school books. Should any of these items be seized you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer. (T.C.A., 26-2-114).

**STATE OF TENNESSEE  
Department of Commerce and Insurance  
500 James Robertson Parkway  
Nashville, TN 37243-1131  
PH - 615.532.5260, FX - 615.532.2788  
Jerald.E.Gilbert@tn.gov**

June 24, 2014

Lloyd'S, Underwriters At London  
25 West 53Rd Street, 14Th Floor  
New York, NY 10019  
NAIC # 180019

Certified Mail  
Return Receipt Requested  
7012 3460 0002 8943 8580  
Cashier # 16135

Re: Estate Of Oma E. Griffith V. Lloyd'S, Underwriters At London  
Docket # 7747

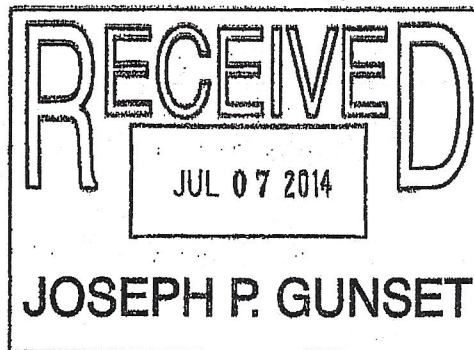
To Whom It May Concern:

Pursuant to Tennessee Code Annotated § 56-2-504 or § 56-2-506, the Department of Commerce and Insurance was served June 24, 2014, on your behalf in connection with the above-styled proceeding. Documentation relating to the subject is herein enclosed.

Jerald E. Gilbert  
Designated Agent  
Service of Process

Enclosures

cc: Chancery Court Clerk  
Marion County  
P O Box 789  
Jasper, Tn 37347





Received this \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.

(This summons is issued pursuant to Rule 4 of the Tennessee Rules of Civil Procedure).

\_\_\_\_\_  
Sheriff-Deputy Sheriff

**RETURN ON SERVICE OF SUMMONS**

I hereby certify and return that on the \_\_\_\_\_ day of \_\_\_\_\_, 2014,  
I: \_\_\_\_\_, served this summons together  
with the complaint as follows:

\_\_\_\_\_  
failed to served this summons within 30 days after its issuance because \_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
Sheriff

\_\_\_\_\_  
Deputy Sheriff

**NOTICE**

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SUMMONS IN CIVIL ACTION - CHANCERY COURT

STATE OF TENNESSEE  
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AT JASPER

IN RE: ESTATE OF OMA E. GRIFFITH )

Deceased )

DEBORAH HOOPER )

Plaintiff )

v. )

UNDERWRITERS AT LLOYD'S )  
750 7<sup>th</sup> Avenue, New York, New York )  
10019 and ATLANTIC SPECIALITY )  
LINES OF VIRGINIA, LLC, 9020 )  
Stony Point Parkway, Suite 450 )  
Richmond, VA 23235 )

Defendants )

No.: 7747

SUMMONS

To the above named Defendant:

Underwriters at Lloyds  
750 7<sup>th</sup> Avenue  
New York, New York 10019

Atlantic Speciality Lines of Virginia, LLC  
9020 Stony Point Parkway, Suite 450  
Richmond, VA 23235

**Ms. Julie Mix McPeak, Commissioner**  
**Department of Commerce & Insurance**  
**500 James Robertson Parkway**  
**Nashville, TN 37243-0565**

You are hereby summoned and required to serve upon J. Harvey Cameron, Plaintiff's attorney, whose address is P.O. Box 759, Jasper, Tennessee 37347, an answer to the Complaint which is herewith served upon you within thirty (30) days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

Issued this 13<sup>th</sup> day of June, 2014, at 8:00 o'clock P.M.

WITNESS, LEVOY GUDGER, Circuit Court Clerk of said Court, at office this the 13<sup>th</sup> day of June, 2014.

Levoy Gudger VL  
LEVOY GUDGER, Clerk and Master

Plaintiff's address: c/o J. Harvey Cameron, P.C., Post Office Box 759, Jasper, TN 37347.

RECEIVED FILED  
8:00 HRS.

JUN 13 2014

LEVOY GUDGER  
CLERK & MASTER

IN THE TWELFTH JUDICIAL DISTRICT OF TENNESSEE  
CHANCERY COURT OF MARION COUNTY

IN RE: ESTATE OF OMA E. GRIFFITH )

Deceased )

DEBORAH HOOPER )

Plaintiff )

v. )

No.: 7747

UNDERWRITERS AT LLOYD'S )  
750 7<sup>th</sup> Avenue, New York, New York )  
10019 and ATLANTIC SPECIALITY )  
LINES OF VIRGINIA, LLC, 9020 )  
Stony Point Parkway, Suite 450 )  
Richmond, VA 23235 )

Defendants )

**COMPLAINT**

Comes the Plaintiff, **DEBORAH HOOPER**, as Administrator of the Estate of Oma E. Griffith, the Co-Administrator, Elbert Griffith, now being deceased, and individually sues the Defendants, Underwriters at Lloyd's and Atlantic Speciality Lines of Virginia, LLC, and for her cause of action would show unto the Court as follows:

I

The Defendants caused to be issued on behalf of the Oma Griffith Estate an insurance policy covering the property of the Deceased located at 7321 Highway 108, Whitwell, Marion County, Tennessee. A copy of the Declaration Page is attached as Exhibit "1" to this Complaint and incorporated herein.

II

On June 14, 2013, pursuant to Order of the Chancery Court of Marion County,



Tennessee the above subject property was sold at public auction and Gary Hooper purchased same. An Oder confirming the report of the Clerk and Master was entered on July 16, 2013.

### III

On the 14<sup>th</sup> of July, 2013, or on the morning of July 15, 2013, the home located on the premises purchased by Gary Hooper and insured by the Defendants was totally destroyed. Gary Hooper, the successful bidder, at the sale requested that said property be vested in his wife, Deborah D. Hooper, a copy of which Clerk and Master's Deed is attached hereto as Exhibit "2" to this Complaint.

### IV

Claims were duly filed through Russ Hood Agency, the agent who caused said policy to be issued. To date, the Plaintiff has had no contact with any claim's agent of the Defendants nor any compensation for the loss although the amount of insurance was One Hundred Twenty Thousand Dollars (\$120,000.00) for said loss. Deborah D. Hooper individually joins in this action due to the fact that said property and improvements thereon had been sold to her husband and ultimately vested in her and although the insurance was still in the name of Oma Griffith's Estate it had not been changed as of date of loss. The Plaintiff avers that she is entitled to the benefits of coverage under the policy unless the Court determines that said proceeds should be payable to the Estate of Oma Griffith.

### V

The Plaintiff in her respective capacities sues the Defendants and each of them in the amount of One Hundred Twenty Thousand Dollars (\$120,000.00) and pre-judgment interest.



**SURETY FOR COSTS**

**CAMERON & CAMERON, P.C.**

By: J. Harvey Cameron

Respectfully submitted,

**CAMERON & CAMERON, P.C.**

28 Courthouse Square, Suite 100

Post Office Box 759

Jasper, TN 37347

(423) 942-9975

E-mail: [jhcam@aol.com](mailto:jhcam@aol.com)

By: J. Harvey Cameron  
J. Harvey Cameron, BPR#2465  
Attorney for the Administrator

**STATE OF TENNESSEE  
COUNTY OF MARION**

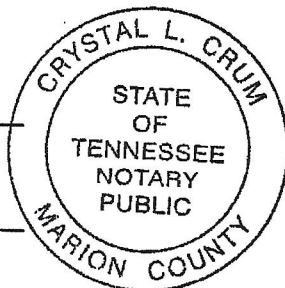
I, **DEBORAH HOOPER**, individually and as Administrator, being duly sworn according to law, make oath that the statements made in the foregoing Complaint are true in substance and fact, to the best of my knowledge, information and belief.

Deborah Hooper  
DEBORAH HOOPER, Individually and  
Administrator

Sworn to and subscribed before  
me 12 day of June, 2014.

Crystal L. Crum  
Notary Public

My commission expires: 11/6/17



Previous Policy Number AS201VA49743-0

Current Policy Number AS201VA49743-1

Proposed Effective Date 03/15/2013 Proposed Expiration Date 03/15/2014  
both days at 12:01 a.m. standard time

Program: Dwelling Fire

## Name and address of the Insured

Oma Griffith Estate C/o Deb Hooper & Elbert Griffith  
6565 Francis Springs Rd

## Name and address of Agent

Russ Hood Agency  
4139 Main Street  
Jasper, TN 37347

Whitwell, TN 37397-

Carrier

Underwriters at Lloyd's

Authority Reference #

AS201/13

UMR #

B040312ARB117

Percentage

100 %

Premises Location 7321 Hwy 108 Whitwell, TN 37397Coverages and Limits of Liability

Coverage is provided where a premium or limit of liability is shown for the coverage. In case of a loss under Section I, we cover only that part of the loss over the deductible stated.

Section I Property

A) Dwelling	\$ 120,000
B) Other Structures	\$ 12,000
C) Personal Property	\$ (Excl)
D) Loss of Use	\$ 12,000

Section II Liability

E) Personal Liability	\$ 300,000
F) Medical Payments to Others	\$ 1,000

Optional CoveragesDeductibles

\$ 1,000 AP

Conditions and Underwriting Notes**\*\*Flood is Excluded\*\***  
(unless otherwise stated in this policy.)**\*\*Quake is Excluded\*\***Premium, Taxes & FeesPremiumTaxesFees

Section I - Property	\$ 1,267.00	Surplus Lines Tax	\$ 70.85	Policy Fee	\$ 100.00
Section II - Liability	\$ 50.00				
Optional Coverages	\$ 0.00				

Subtotals	\$ 1,317.00	\$ 70.85	\$ 100.00
Grand Total			\$ 1,487.85

Other InterestsForms and Endorsements

PLFORMS (01/00)	RDNOS (01/08)	NMA 2920 (01/08)	NMA 1256 (01/08)	HO 0490 (10/00)
PLINPO (01/00)	CMDZ (01/08)	NMA 2340 (01/08)	LMA 5021 (01/08)	ASL 1021 (01/08)
ASL FLD EX (01/07)	EMF (01/08)	LMA 5019 (01/08)	LSW 1001 (01/08)	ASL 1025 (03/08)
PLDEC (01/00)	LDPSN (01/08)	MOLD (01/08)	NMA 1168 (01/08)	ASL 1035 (01/11)
ASL CLAIM (01/09)	NMA 2802 (01/08)	LSW 1135b (01/08)	NMA 1331 (01/08)	ASL 1028 (01/09)
ALB (01/04)	NMA 2915 (01/08)	NMA 1191 (01/08)	ASL 1002 (11/99)	ASL 1027 (01/09)
UNSWPL (01/08)	NMA 464 (01/08)	LMA 5020 (01/08)	HO 0003 (10/00)	NMA 2962 (01/08)

\*\*\*PLEASE NOTE: ONCE THE RENEWAL PREMIUM HAS BEEN RECEIVED AT THE PO BOX STATED ON THE INVOICE, COVERAGE IS CONSIDERED BOUND AND FLAT CANCELLATIONS ARE NOT PERMITTED. BOUND POLICIES ARE SUBJECT TO THE MINIMUM EARNED PREMIUM CLAUSE STATED IN THE POLICY AND ALL POLICY AND INSPECTION FEES ARE FULLY EARNED.\*\*\* IN THE CASE A CHECK IS RETURNED FOR INSUFFICIENT FUNDS, THE POLICY WILL BE CANCELLED FLAT WITH NO COVERAGE AFFORDED.\*\*\*

Prepared by and return to:  
J. HARVEY CAMERON, P.C.  
28 Courthouse Square, Suite 100  
Jasper, TN 37347; from information  
supplied by the parties.

SEND TAX BILLS TO:	MAP/PARCEL NUMBER
Deborah D. Hooper	Map 11
6565 Francis Spring Road	Group
Whitwell, TN 37397	Portion of Parcel 093.00

#### CLERK & MASTER'S DEED

WHEREAS, the Clerk & Master of Marion County, Tennessee pursuant to judgment entered in Cause #PR-72, in the Chancery Court of Marion County, Tennessee, styled In Re: Estate of Oma E. Griffith, conducted a land sale on June 14, 2013, ; and,

WHEREAS, the Grantee herein was the highest and best bidder for the consideration herein stated; and,

WHEREAS, said sale was confirmed by order of the Marion County Chancery Court filed July 16, 2013, and entered in Minute Book 30, Pages 401, et seq., said Clerk & Master's Office; and,

WHEREAS, the purchaser at said sale being the grantee has requested the Clerk & Master to execute and deliver to him a deed for said property.

NOW, THEREFORE, IN CONSIDERATION of the sum of Five Thousand Dollars (\$5,000.00) cash in hand paid, the receipt of which is hereby acknowledged, I, LEVOY GUDGER, Clerk & Master of the Chancery Court of Marion County, Tennessee, by virtue of the power and authority conferred upon me, do hereby transfer and convey unto

**DEBORAH D. HOOPER,**

her heirs and assigns, the following described real estate located in the Third Civil District of Marion County, Tennessee to-wit:

#### TRACT ONE:

Beginning at an iron pin in the west right-of-way line of State Highway 108 the Southeast corner of lands of J. C. Ritchie as described in deed of record in Deed Book 7-L, Pages 380, et seq., in the Register's Office of Marion County, Tennessee; thence along the west right-of-way of State Highway 108 South 54 deg. 50 min. 00 sec. East 188.57 feet to an iron pin; thence South 48 deg. 12 min. 41 sec. West 115.06 feet to a power pole located in



the East right-of-way of Griffith Church Road; thence along the East right-of-way of Griffith Church Road North 35 deg. 56 min. 05 sec. West 154.45 feet to a point; thence along a curve to the right having an bearing of North 19 deg. 55 min. 41 sec. West 55.73 feet, an arc of 56.46 feet and radius of 101.05 feet to an iron pin the same being the Southwest corner of lands of J. C. Ritchie; thence along Ritchie's South line North 79 deg. 15 min. 00 sec. East 42.01 feet more or less to the Point of Beginning containing 0.32 acres more or less.

**TRACT TWO:**

Beginning at an iron pin in the East right-of-way of Griffith Church Road the same being the Northwest corner of lands of Clayton L. Worley of record in Deed Book 6-P, Pages 297, et seq., in the Register's Office of Marion County, Tennessee; thence along the east right-of-way line of Griffith Church Road North 35 deg. 56 min. 05 sec. West 55.52 feet to a power pole the same being the Southwest corner of Tract Number Two hereinabove described; thence along the South boundary line of Tract Number Two North 48 deg. 12 min. 41 sec. East 115.06 feet to an iron pin the same being in the West right-of-way line of State Highway 108; thence along the West right-of-way line of State Highway 108, South 54 deg. 50 min. 00 sec. East 93.65 feet to an iron pin the same being the Northeast corner of lands of Clayton L. Worley; thence along Worley's North boundary line South 40 deg. 21 min. 13 sec. West 152.00 feet more or less to the Point of Beginning containing 0.31 acres more or less.

**PRIOR DEED REFERENCE:** Deed Book 6-P, Pages 296, et seq., in the Register's Office of Marion County, Tennessee.

TO HAVE AND TO HOLD said real estate with all the hereditaments and appurtenances thereto, to the said Grantee, her heirs and assigns, in fee simple, forever. This conveyance is made in as full and ample a manner as the said Clerk & Master can convey under authority of law and said judgment, entered in this cause, but not further or otherwise.

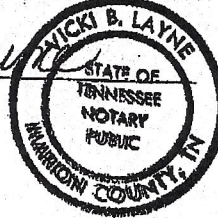
IN WITNESS WHEREOF, I have hereunto subscribed my name as said Clerk & Master, on this the 18<sup>th</sup> day of July, 2013.

  
LEVOY GUDGER, Clerk & Master

STATE OF TENNESSEE  
COUNTY OF MARION

On this the 18th day of July, 2013, before me personally appeared Levoy Gudger, Clerk & Master, to me known to be or proved to me on the basis of satisfactory evidence to be the persons described in and who executed the foregoing instrument and who acknowledged that he executed the same as his free act and deed.

Wicki B. Layne  
Notary Public



My commission expires: 7-10-16

CONSIDERATION AFFIDAVIT

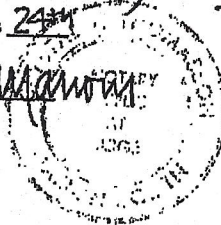
I, or we, hereby swear or affirm that the actual consideration for this transfer, or value of the property or interest in property transferred, whichever is greater is \$5,000.00, which amount is equal to or greater than the amount which the property or interest in property transferred would command at a fair and voluntary sale.

J. Harvey Cameron  
AFFIANT

Subscribed and sworn to before me this 24th  
day of July, 2013

Crystal L. Johnson  
NOTARY PUBLIC or REGISTER

My Commission expires: 11/18/2013



BK/PG: 451/920-922

13002783

3 PGS : AL - CLERK & MASTERS DEED	
SANDRA BATCH: 48165	07/28/2013 - 11:01:52 AM
VALUE	5000.00
MORTGAGE TAX	0.00
TRANSFER TAX	18.50
RECORDING FEE	15.00
ARCHIVE FEE	0.00
CP FEE	2.00
REGISTER'S FEE	1.00
TOTAL AMOUNT	36.50

STATE OF TENNESSEE, MARION COUNTY  
WINFRED HAGGARD  
CLERK OF DEEDS

State of Tennessee  
Dept. of Commerce & Insurance  
Service of Process  
500 James Robertson Parkway  
Nashville, TN 37243

**CERTIFIED MAIL**



7012 3460 0002 8743 8580

FIRST CLASS



UNITED STATES POSTAGE  
02 1M \$08.69<sup>00</sup>  
0004292626 JUL 01 2014  
MAILED FROM ZIP CODE 37243

7012 3460 0002 8743 8580 08/24/2014  
LLOYD'S, UNDERWRITERS LTD LONDON  
25 WEST 53RD STREET, 14TH FLOOR  
NEW YORK, NY 10019

06  
7/5

100195401 0008

